



J. Onaodowan, Esq.

eonaodowan@eocdlaw.com

t 646.375.2119 c 718.427.3139

Christine E. Delince, Esq.

cdelince@eocdlaw.com

t 646.375.2117 c 917.238.9332

November 10, 2020

BY ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: U.S. v. Martinez (MKV)
20 Cr. 213

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/11/2020

Dear Judge Vyskocil,

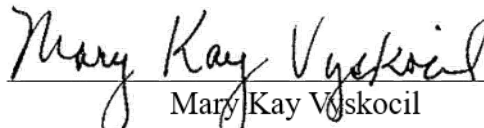
I represent Victor Martinez in the above captioned case. I am asking that the court reconsider its denial of the Mr. Martinez bail modification request of November 10, 2020. I neglected to include the position of Mr. Martinez's pre-trial officer in my last submission. Mr. Martinez pre-trial officer Ms. Piperato states: "I have no objection to his travel on Saturday so long as he can just give me a possible time frame."

Mr. Martinez is currently out on bond with his travel is restricted to the Eastern and Southern Districts of New York, and Boston, Massachusetts. This Saturday December 12 is his son's birthday. Mr. Martinez would like to take his son to the Nickelodeon Universe American Dream theme park, which is located in East Rutherford, New Jersey. I am writing to respectfully request that Mr. Martinez's bail conditions be modified to allow him to travel to the District of New Jersey on Saturday December 12, 2020 from 3:00PM to 10:30PM.


I have spoken to the Government who take no position but defer to Pretrial Services.

GRANTED. Mr. Martinez is permitted to travel as set forth in this letter. However, he must report to his assigned Pretrial Services Officer upon arrival at the theme park, when he returns home, and at any other times as directed by his Pretrial Services Officer. SO ORDERED.

Date: 12/11/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully Submitted,


Christine Delince, Esq.